

National Housing Strategy Consultation Comments

City of Hamilton

September 2016 (Comments due October 21)

The following are City of Hamilton staff comments on the national housing strategy consultation. Council endorsement will follow pending the October 26, 2016 meeting of Council.

It is important that this strategy lead to specific actions. Probably the most important aspect is that it be adequately funded. In Ontario, municipalities have borne most of the costs of delivering housing services over the last 16 years. Hamilton is grateful for the additional funds for housing allocated through the 2016 budget and the Social Infrastructure Funding Program, and hope this funding is indicative of federal intentions to further enhance financial support.

A vision for Canada's National Housing Strategy could be:

All Canadians have access to housing that meets their needs and they can afford. Housing is the cornerstone of building sustainable, inclusive communities and a strong Canadian economy where we can prosper and thrive.

Is this vision a step in the right direction? Does it achieve our goals? Does it make sense for you and your family?

Response:

For the most part, the City of Hamilton supports this vision. It aligns with the vision in our Housing and Homelessness Action Plan, "Everyone Has a Home: Home is the Foundation." Both visions recognize the foundational role that affordable suitable housing has in building communities and supporting Canada's economy. However, to recognize the foundational role housing has in people's lives and make this vision more people-centred, it is suggested that the words ", developing healthy people" or something similar be added after the words "cornerstone of."

Key principles

The national housing strategy will be developed according to ten core principles:

Results-based

- **Environmentally sustainable:** we want housing to contribute to a cleaner environment and support a greener tomorrow

- **Performance tied to results:** we measure our performance; evaluate our outcomes; and base our decisions on the best evidence of what works
- **Self-reliance:** we seek to support greater self-reliance for individuals, families and housing providers, where possible
- **Fiscally responsible:** we seek fiscally responsible housing responses and leverage support from others
- **Flexibility:** we recognize that there is no one-size-fits-all solution to addressing housing needs
- **Community-centred:** we believe housing should be community-based and consider access to public transit, proximity to work, amenities and services
- **Economic stability:** we want a stronger housing system that supports stability in the Canadian economy and helps withstand fluctuations in the economic cycle

Process-based

- **Innovation:** we encourage innovative new approaches
- **People-centred:** we remember that people are at the heart of all housing solutions
- **Collaboration:** we value collaboration and build respectful relationships

Response:

The City of Hamilton supports these values. Distinguishing the values as “results based” or “process based” helps clarify their purpose. However, values that are missing are “equity” and “inclusivity.” The vision says housing for all Canadians, and “inclusivity” is a proposed theme, but “inclusivity” as well as “equity” should also be values. “People-centred” is not dissimilar, but is not the same as equity or inclusion.

“People-centred” requires that people are able to inform the solutions to their own housing issues.

To make the “Performance tied to results” value a reality will mean collection of data additional to what is collected currently. Data needs are detailed elsewhere in this submission. The strategy should also be sensitive to the fact that some outcomes are hard to quantify, but are no less valuable and helpful to individuals and families. These can include such outcomes as reduced time spent, the need for crisis intervention, reduced life stress, and improved quality of life. Measuring sustainability is difficult because there is no universal definition and it encompasses many aspects of our society, economy, and governing institutions, as well as our interactions with the natural environment.

Under “Self-reliance,” the words “we seek to support greater self-reliance” could be revised to “we build capacity to increase self-reliance.” The words “where possible” in the “Self-reliance” value is important as it recognizes that there are some Canadians who, for any number of reasons, cannot be self-reliant and need

supports. Often it is most successful for these supports to be associated with housing to enable those who need supports to maintain stable housing. These supports may be financial, social, medical, or pertain to personal care or other daily needs.

While it is important to facilitate self-reliance to the extent possible, there are many people in Hamilton who do not have the supports they need and therefore struggle to remain housed and live healthy and productive lives. The national housing strategy needs to ensure appropriate resources for housing supports.

Additional comment regarding these values is found in the `Themes` discussion below.

Themes for discussion

Sustainability

Environmentally sustainable and resilient homes that contribute to Canada's climate change goals

Housing has a big impact on our **environment**. Sustainable solutions are needed. New approaches can build more **resilient homes and communities**. Reducing energy consumption in housing will also help Canada reach its **climate change goals**. How can we build a greener future through housing?

Response:

It is important to protect the environment, reduce energy consumption to meet climate change goals, and build more resilient homes and communities. It is also important to reduce energy costs for low income citizens. Often low income households live in housing that is not energy efficient because it is affordable, and if they are property owners, they may lack the resources to upgrade energy efficiency. This means that they frequently pay high utility costs. Actions under this theme can include:

- *Expanding investments in research for new cost effective housing technologies that can reduce long-term impacts on the environment, building costs, and ongoing energy costs*
- *Removal of the GST from utility costs*
- *Incentive programs to enable energy efficiency retrofits of private, social, and non-profit housing*

- *Incentive programs for environmental cleanup of building sites to encourage intensification and its multiple environmental benefits*
- *Incentive programs for meeting recognized environmental standards for new private, social, and non-profit housing development*

Environment and design matter to people. They make a difference to both functionality and quality of life. This must be kept in mind when developing new affordable housing.

Building a stronger affordable housing sector

Canada needs a **strong affordable and social housing sector**. Canada's affordable housing sector should be financially viable and contribute to new housing supply. A strong affordable housing sector is less reliant on government funding. It also **attracts private investors** and supports a sustainable future. How can we build a strong and financially healthy affordable housing sector?

Response:

End of Operating Agreements (EOA)

One of the most pressing issues facing the sustainability and financial strength of social housing providers is the on-going expiration of long-term operating agreements. With the onset of mortgage maturity and expiring agreements, Service Managers in Ontario must make complex decisions about maintaining legislated service level standards while facing aging housing stock and declining federal funding. Social housing providers are challenged to maintain operational viability when subsidies decrease or terminate at operating agreement / mortgage expiry. The end of operating agreements threatens to chip away at the supply and preservation of housing that meets deep affordability needs as some social housing providers re-assess their mandates and commitments to social housing.

Rent geared-to-income housing has been an integral part of the affordable housing system in Hamilton. The City, as Service Manager, is working with housing providers to develop end of operative agreement transition plans to ensure the housing needs of current tenants will be met, and to develop strategies to ensure a continuum of affordable housing for our community. There are many financial implications to the end of operating agreements, and a multitude of potential strategies available to each housing provider. Therefore a detailed financial analysis cannot be provided at this time.

Recognize the Role of Non-Profit Housing Providers

The consultation documents focus on social housing and the private sector, but other non-profit providers of affordable and, often, supportive housing are an important third sector to carefully consider in housing system planning and support. By not drawing a profit, they provide high value for government housing funding.

Additionally, as their motive is to provide the best service possible for vulnerable clients, when non-profit providers seek government funding such as through the Investment in Affordable Housing Program (IAH), they are often able and willing to commit to long periods of affordability, and other public goals such as accessibility, to a greater extent than the private sector. They also tend to serve a more vulnerable and lower income demographic.

Hamilton has a robust non-profit sector that, partly as a result of their success with IAH requests for proposals, has produced the majority of the new affordable rental housing in Hamilton in recent years. These projects also serve the lowest income tenants, many of whom are in receipt of Ontario Disability Support, and provide supports of varying types and degrees to their tenants.

Social and other non-profit housing providers currently face financial barriers that do not allow them to maximize their contribution to the housing system. The inability to borrow against their assets is one such barrier, though it is provincially regulated. The structure and rules governing CMHC mortgage insurance do not adequately meet the needs of the non-profit and social affordable housing sectors. A separate mortgage insurance product for non-profit and social housing providers of affordable housing would be helpful. Additionally, incentive programs should consider the unique role of non-profit housing providers in the housing system.

Housing is the foundation for a better quality of life

Housing is more than shelter. It helps Canadians gain access to important socio-economic opportunities, including jobs, education and services. Moving from **social to market housing** is possible for some. What approaches can help?

Response:

As noted later in this submission, housing affordability is an income as well as housing supply issue. People working full-time should be able to afford to live in market housing, thus a living minimum wage is key to moving people from social to market housing. A national day care program can enable people to work who

cannot find affordable child care privately, thus increasing their opportunities to move from social to market housing.

A portable housing benefit can help people bridge the gap between what they can afford to pay for housing and rents in the private market. If provided in a timely manner as the need arises, they can help keep people stably housed. Portability of a housing benefit is important to enable choice and flexibility, and to best support people as their needs change. Portability and recipient autonomy can increase capacity for housing stability and promotes greater self-reliance.

A guaranteed annual income would ensure that everyone can afford housing. A flat income support for low income earners ensures modest housing for all and destigmatizes housing benefits.

Finally, many people require supports to be stably housed, whether in social, non-profit, or market-rate housing. Providing these supports where people live, and enabling people to choose the supports they need, not only improves their lives, but reduces the costs of many social, health, emergency, and corrections services.

In discussions of housing it is important to also discuss the importance of neighbourhoods and communities. Affordable housing and a full range of housing options need to be distributed throughout municipalities to enable people to stay in their communities and maintain their support systems and familiar environments when their needs change. Neighbourhoods and communities are an important source of informal supports.

A stronger housing system that contributes to economic growth and financial stability

A well-functioning housing system is necessary to meet the housing needs of Canadians. Canadians must be able to rely on a **strong and resilient housing system** for the long term **stability of the economy**. What changes would help us achieve our vision for housing?

Response:

Canada's housing system has to meet the needs of all Canadians, but right now it only effectively meets the needs of those with middle to high incomes. This is not strong or resilient, and it impacts all communities economically. This creates challenges when employees cannot live close to their work. Parts of the housing system can be provided by the private market, but other parts cannot. It is necessary for the federal government to fill these gaps. Other parts of this submission discuss specific means of support for these sections of the housing system.

Supportive institutional and regulatory frameworks

Strong housing institutions and effective regulations and laws are needed to meet the housing needs of Canadians. Better integration and alignment of policies, programs and regulations across all levels of government will help achieve better housing outcomes for Canadians. What changes are required?

Response:

Better integration and alignment of policies, programs and regulations across all levels of government and between government departments are important to meet the housing needs of Canadians, particularly when resources are scarce. For instance, federal Housing First initiatives have been successful, but they have experienced supply and affordability challenges in finding appropriate affordable units.

Additionally, it is necessary to pair housing supply and affordability programs with supports programs, ensuring they reinforce one another. Funding supply programs without at the same time funding related supports, and vice versa is counterproductive. It is necessary to allow greater latitude to stack programs such as supply and supports programs. This is important to meet the full range of needs.

Housing is inextricably linked to other government concerns such as health, education, and corrections. These issues need to be examined and budgeted for holistically. Investments in housing can improve health and reduce consumption of other government services such as health and emergency services, and corrections. Investments by one level of government can create savings for another level. For instance, municipal investments in housing reduce the costs of health care for the provincial governments, and the costs of corrections services for both the federal and the provincial governments.

Ontario is in the midst of a transformation of its housing system. The federal government should work closely with the provincial governments to ensure their respective programs, regulations, and approaches work together.

Investments in the national housing strategy must recognize that the return on investment is significant, but much of it will be long term. It takes time for investments in housing to show the benefits of better health, educational and employment attainment, and less use of the corrections system.

CMHC

There is a larger potential role for CMHC to play in knowledge transfer, coordination and collaboration, and facilitation. CMHC data is vital to the housing sector, and CMHC educational materials and educational events are always productive. The local events enable knowledge transfer from experts such as academics and consultants to municipal employees, developers and others, and provide opportunities for collaboration. Webinars are efficient ways of transferring knowledge. Because policy and program development government staff have limited time to do research, these activities are an important source of up-to-date information to inform daily work.

Affordability

Affordable financing and access to affordable lands for rental housing

Rental housing is expensive to build. The high cost of **land** is a key contributing factor. Lowering the costs to develop rental housing can support more affordable rents. **Access to low-cost financing** is one way to lower the cost of construction and make housing more affordable. What innovative approaches are needed?

Response:

Financial Viability of Rental Housing Development

It is particularly important to strengthen the affordable rental housing sector, including the private, non-profit, and social housing sectors. Because of the current tax structure and financial realities of new development, in Hamilton it is generally not financially viable to build new rental housing. Very little has been built over the last 20 years, and much of that was built with substantial government funding.

While some rental housing is starting to be built in strong markets, in Hamilton it is not affordable and Investment in Affordable Housing (IAH) funding or municipal incentives are needed to make projects financially viable. Over time this increasingly constrains the rental market and puts additional upward pressure on rents.

There is more and faster profit, with less risk, to be made in the higher end of the housing market, and the ownership market, which leaves a substantial gap on the affordable and rental parts of the housing system. This leaves those needing affordable housing further and further behind.

There is a higher need for particular types of units. There are few large units for large families which makes it particularly challenging to find housing for newcomer families, as newcomer families are often large. Accessible units are also needed in all parts of the housing system.

Options for facilitating the development of new rental housing, and new affordable rental housing include:

- *A tax system that encourages investment in rental housing*
- *Financial incentives to make new development viable, with developers committing to long term affordability, rental tenure, and a certain proportion of units that are accessible to persons with disabilities. These could include grants as well as loans and should be based on the financial realities of development in local areas. Attention should be paid to the concept of adaptable housing that can be easily adapted to meet a variety of accessibility needs.*
- *Specific incentives for units for large families as there is a substantial undersupply and growing need, and they are less financially viable to build than smaller units*
- *Specific incentives for units for persons with disabilities*
- *Affordable financing as is planned to be delivered by CMHC*
- *Availability of federal lands for affordable housing development at no or reduced cost*

Hamilton is in the process of setting up a subcommittee of Council to consider City-owned lands to be used for affordable housing development, and to develop a process by which to provide those lands to affordable housing developers at no or reduced cost.

One significant source of lands that are ideal for affordable infill projects are the sites of closed schools. Currently, these lands can only be purchased at full market value, which can be cost prohibitive for municipalities and affordable housing developers. While this is a provincial jurisdiction, the federal government could provide an incentive or funds specifically to enable municipalities to purchase surplus government lands and hold them until they can be best utilized for affordable housing. As municipalities best understand their development needs and climate they are the best level of government to hold the lands. Dedicating lands to a land trust organization for affordable housing is another option.

As there has been little funding and it has not been financially viable to build new rental housing for the last twenty or more years without IAH funding, there is now limited capacity to do so. This is particularly the case for affordable rental housing. Below are actions that can lower the costs of construction and increase local capacity to develop new affordable housing:

- *Fully remove the GST from construction materials and construction services*

- *Provide 0% interest financing for affordable housing projects, that is not required to be paid until buildings are occupied*
- *Develop a CMHC mortgage insurance product specifically for affordable housing, with different risk assessment criteria*
- *To reduce development costs and increase development capacity, CMHC could provide affordable professional construction services and free expertise through CMHC for smaller developers with less knowledge of development and capacity to hire professional services. These services could include planners, lawyers, project managers, designers, architects, engineers, and financial consultants. While the CMHC Seed Funding Program provides funding for professional services, project planning has to be fairly advanced for a project to qualify. There is much work that needs to be done prior to submission for Seed Funding, such as feasibility analysis. This work could be better supported by CMHC.*
- *CMHC could host information sessions for those interested in developing affordable housing. There are many developers and organizations who are interested, but they often don't fully know what is involved or understand where to start. Partnerships can help, but there are not enough able partners.*

Affordability pressures in Canada's largest cities and certain areas

Housing costs can be a burden for low-income Canadians and aspiring homeowners in certain **cities**. In the **North**, a harsh climate means it's expensive to build, repair and maintain homes. How can we support better housing outcomes in these markets?

Response:

Extreme housing prices in Toronto are pushing people from elsewhere in the Greater Toronto Area to Hamilton, which is accelerating the increase of housing prices in Hamilton. Relieving some of the housing price pressure in Toronto would benefit the entire Greater Toronto and Hamilton Area. Suggested responses are found in other parts of this submission.

New affordable rental supply, including through increased private sector involvement and maintenance/preservation of existing stock

Rental housing is home to 30% of Canadians. Supporting **more affordable rents** can help reduce poverty and grow the middle class. In many cities, developers are building

more condos than affordable rental units. In addition, **existing rental housing is aging and in need of repair**. How can we support a **stable supply of rental housing** that is affordable?

Response:

Repositioning of Rental Buildings and Condominium Conversion

There is a problem in Hamilton with the condition of rental buildings, most of which are getting old. Many have recently been bought and are in the process of being "repositioned" in the market or sold as condominiums. The emerging pattern is to offer existing tenants of low rent units financial incentives, often quite significant, to voluntarily vacate their tenancies. Once landlords have vacant possession, the unit is fully renovated and upgraded, and, depending on whether or not the owner has been successful with a condominium conversion application, rented out at a much higher rent or sold as a condominium. This pattern is happening in many areas of the city.

Two factors are driving this pattern:

- 1. The ability to command higher rents, and*
- 2. Maintenance costs.*

Because so little new rental housing has been built in the past 20 years, many buildings are old and major systems are reaching the end of their lifecycle. With low rents (in part due to the condition of the buildings) there is little money left over to make major system repairs. The costs of bed bug control are further eroding maintenance funds. It is thus sometime necessary for landlords to raise new funds. Two ways of doing so are to raise rents, and convert to condominium and sell units or borrow against the increased equity.

Incentives for repairs of major systems in exchange for a commitment to long term rental tenure and affordability could help prevent the further erosion of rental stock and the affordability of rental stock.

Bed Bugs

Bed bugs both erode quality of life, particularly for the most vulnerable, and consume inordinate amounts of funds that would otherwise be spent on building maintenance. Spending on bed bug treatments often leads to rent increases to cover treatment costs. A national bed bug strategy is needed.

Apart from a strategy there is an urgent need for research and approval of more effective safe pesticides and other methods of control. Currently approved pesticides have limited effectiveness and are losing their efficacy as the bed bugs become resistant to them. Safe persistent pesticides and other methods of control

are needed to increase control as well as reduce the amount of preparation required for successful treatment. Too much preparation is required and often cannot be completed by vulnerable people. The need is urgent.

Also see responses under "Affordability."

Access to housing for first-time homebuyers

First-time buyers (FTBs) with mortgages accounted for just over 40% of all home sales from 2010-2014. What factors have an impact on **first-time buyer access** to housing over the next decade compared to the last decades? For example how does level of income, **house prices** and interest rates impact access to housing? Is homeownership within reach?

Response:

Affordable rental housing contributes to first-time home buyers' ability to purchase a home because, if affordable enough, it can enable them to save a down payment. More young people are choosing to rent and many are being forced to rent as they cannot afford to purchase a home. This is putting increased pressure on the rental market and is fueling a demand for higher end rental units.

While it is important to maintain for environmental and food security reasons, in Ontario the Greenbelt Plan and other provincial policy, by reducing access to cheap greenfield land, is putting upward pressure on home prices. This is exacerbated by challenges in building infill projects; challenges of neighbourhood opposition and Ontario's Ontario Municipal Board process; meeting various municipal requirements such as parking, environmental clean-up, noise regulations; availability of commercial mortgages in the inner city of Hamilton; and increased development costs and uncertainty. Reducing these challenges is critical to reducing the costs of new housing.

Ontario is undertaking a review of the scope and effectiveness of the Ontario Municipal Board. It is hoped that Ontario Municipal Board reform will reduce some of the challenges of infill development, particularly neighbourhood opposition. Incentives, such as the City of Hamilton offers, can reduce the costs of environmental clean-up. Other incentives that make infill development more attractive and offset the costs of some of the above challenges could increase infill development and help offset some of the market pressures caused by land constraints.

One factor driving the rapid price increases in the ownership housing market is property speculation. A tax structure that discourages land speculation could help slow the price increases.

Inclusivity

Distinct housing needs of low-income and vulnerable Canadians, such as seniors, newcomers, people with disabilities and homeless people

About 20% of Canadians require assistance to meet their housing needs. Some groups have distinct needs that require unique solutions, including: the **homeless, recent immigrants, lone-parent families, persons with disabilities, victims of family violence, seniors and Indigenous households**. What new approaches can make a difference?

Response:

Inclusivity and Choice

As noted above there are a variety of housing needs among distinct groups and individuals. The response below touches on a number of specific groups with specific needs, but there are still individual differences to consider and other groups that are not included below. For this reason flexibility and choice are important elements for Canada's housing system. In particular, vulnerable citizens, to best meet their needs, need choice in the supports that are available to them. Such choice can create efficiencies by not providing services where they are not needed.

First Nations and Aboriginal Peoples' Housing Needs

The housing needs of First Nations and aboriginal peoples, including those in urban areas, are unique and should be addressed as an independent section of the national housing strategy if not a separate strategy. Programs serving First Nations and aboriginal peoples should have separate funding streams to ensure they are adequately funded.

Homelessness

- *Canada needs to take the approach of pursuing goals to end homelessness rather than simply managing it. Strong leadership from the federal government is necessary to achieve this goal.*

- *Homelessness is everyone's responsibility; meaning, it requires a long-term commitment from all three levels of government, the private sector, the non-profit sector and the community.*
- *Canada's national housing strategy needs to include aggressive national targets and timelines to achieve results in ending homelessness. Supports also need to be provided to communities to assist in tracking and monitoring progress on achieving these targets.*
- *Ending homelessness requires collaboration across systems and stakeholders. For the public systems (health, corrections, child welfare etc.) the federal government needs to take the lead on communicating and sorting out relationships/ agreements with their provincial counterparts for communities to move forward on federal initiatives where multiple stakeholder involvement is required.*
- *Hamilton supports the continued and expanded investment in the Homelessness Partnering Strategy. This investment ought to be part of a long term commitment that takes into consideration the increased costs to provide services over time.*
- *As a community that has demonstrated excellence in achieving results, Hamilton supports a national housing strategy which aligns with promising practices in homelessness interventions targeted at ending chronic homelessness. These interventions need to be intentionally aligned with affordable housing strategies.*
- *Hamilton supports the continuation and expansion of investments in Housing First with an understanding that housing affordability is a major barrier for people in achieving housing stability. Future investments in Housing First programming should include tools for communities to make housing more affordable.*
- *To better address homelessness, additional resources are needed for supports and intensive case management for populations with acute needs, such as those with chronic physical and mental health issues. These services are under-supported in Hamilton.*
- *The federal government should take the lead and increase their commitment to providing dedicated capacity building supports to communities. Training, research support, toolkits and information sharing initiatives should be a priority to ensure a sustainable approach to ending homelessness.*

Women's Homelessness and Survivors of Domestic Violence

To end women's homelessness in Hamilton, additional resources are needed. Hamilton has 140 violence against women shelter beds and 45 shelter beds for single homeless women. The occupancy rate of these shelters for 2014-2015 was 104% and there were a large number of women turned away. Over only four of the violence against women shelters in Hamilton, in 2015 there were a total of

approximately 6,359 turn-away events, the preponderance of which were because the shelters were full. In 2014 the various violence against women shelters turned away a nightly average of 5, 3, 2 and 0.4 women or families. (These are not all unique individuals.) This means that every night in one shelter in Hamilton, 5 women or families who sought help escaping an abusive situation did not receive appropriate help. They returned to the abuser, found alternative accommodation, or became homeless.

Violence and abuse is one of the leading causes of women's homelessness. This means that to end women's homelessness, experiences and the risk of trauma, violence and abuse, as well as the lack of affordable safe homes, need to be addressed. For some women and children, remaining housed means experiencing violence and abuse. Leaving an abusive situation can escalate the risk of violence, and accessing new housing can also place women and children in danger. Women who are homeless are vulnerable to even more violence. Homeless women have 10 times the mortality rate of other women, and on average die at age 39. This experience of violence creates unique vulnerabilities for women and children experiencing homelessness.

In Hamilton there is a significant unmet need for women's shelter beds, transitional homes, and permanent safe affordable homes. Women and children remain in shelter and transitional homes longer than necessary due to a lack of safe affordable permanent units. This means that other women and children escaping violence and abuse are not able to access shelter or transitional homes, and many are turned away when they are in crisis.

This reinforces the need for additional supply of affordable rental housing, including social housing, in Hamilton. While affordable safe housing is necessary, it is not sufficient for survivors of domestic violence to reestablish their lives. Additionally, both immediate and long term supports are critical, including transitional housing support, as well as counselling and other mental health and health services for both women and children.

Accessibility

As Canada's population ages we have increasing needs for accessible housing in all parts of the housing system. There are few housing options for persons with disabilities, particularly when they have limited incomes. New rental development in Hamilton that has been supported by IAH funding has contributed significantly to Hamilton's accessible stock, but much more is needed. Attention should be paid to the concept of adaptable housing that can be easily adapted to meet a variety of accessibility needs.

The Ontario Building Code has been updated to reflect accessibility needs, but it does not meet the needs of all persons with disabilities. Units that provide more accessibility than the Building Code requirements are required.

Specific incentives are required as fully wheelchair accessible units are more costly to develop. There are also many accessibility features that are low cost when incorporated into a new development, such as levered door handles, walls that can accommodate grab bars, right height toilets, accessible height switches and receptacles, appliance control location, wider doorways, and more. These features are particularly important to accommodate changing accessibility needs, such as in persons who are aging or with a progressive condition, and should be required in all developments receiving incentives.

As accessibility needs are so individual and change over time, particularly for aging adults, housing providers need the ability to make accessibility modifications. This should be considered in funding of social housing repairs and other rehabilitation programs.

Older Adults

Hamilton's Plan for an Age-Friendly City recognizes the unique housing needs of older adult and seniors. The needs are multiple-fold. There are many reasons people need to be supported to remain in independent homes as long as possible; however, this is difficult to do with the current housing options available to aging adults.

Social housing wait lists for those who need financial supports are years long. Many areas of Hamilton have few housing options that are appropriate for older adults who are developing accessibility needs or can no longer drive and need to be near transit and services. Often older adults wish to move to housing that better meets their needs as they age, but there are few options for those who can afford to pay market rates and even fewer for those who need affordable units. If people are able to find the right unit, it often means a move from a familiar and supportive neighbourhood, which increases isolation.

A greater variety of affordable housing forms such as single level homes, rentals, and accessible units, distributed more widely across the city is needed. Stable income supports for some seniors are also required for them to maintain housing stability.

The need for mobile supports to enable seniors to remain in independent homes is substantial, but it is the most affordable way to support independence. While many of these support needs are under provincial jurisdiction, there is an opportunity for the federal government to participate in increasing the supply of more units as well as some services such as transit. Federal government programs for both housing supply and supports should be integrated with provincial and municipal support programs. The Province of Ontario is working to better coordinate services for older adults, such as health and other types of supports, but any federal programs should also be coordinated.

With Hamilton's rapidly increasing property values, many senior homeowners on a fixed income are finding paying property taxes to increasingly be a challenge. The City has a property tax deferral program to help, but a federal program based on income would also be helpful.

Newcomers

Newcomers are essential for Canada's economic success, but there is much work to be done to welcome them by providing adequate housing. Many newcomer families are large and there is a tightly constrained supply of large affordable rental units, making it hard to house newcomer families quickly. In Hamilton this was a challenge with our Syrian refugee families. The challenge of finding housing is compounded when some families have disabilities as a result of the trauma they have experienced.

The per unit development cost for large units is high. This means that the private sector is not building large rental units, nor are they being built with the IAH Program. With a limited amount of funding, more small units can be produced than larger, and there is a substantial unmet need for small units. New large units are thus not being produced. It is necessary to have specific programs to facilitate their development.

Newcomer families lack information about how to navigate the housing system and deal with housing problems that may arise. It is important to provide information to newcomers about accessing housing, the laws about housing such as their rights and responsibilities as tenants, how to maintain a home in the Canadian climate, and more. It is also important to provide them with supports for a period of time to help address any challenges they may have with their housing.

Social housing renewal and socially-inclusive communities

Social housing is a type of affordable rental housing. It is also an important community asset that helps bring stability to Canadians in need. Social housing needs to evolve to **meet changing community needs**. How can social housing promote **inclusion** and well-being?

Response:

The Need for New Rent-Geared-to-Income Housing

The wait-list system for accessing social housing continues to demonstrate the need for rent-geared-to-income housing. In Hamilton, there have been, on average, 6,000 households waiting for units in social housing and this number has climbed exponentially in the first half of 2016. Challenges include a lack of available units, the increasing demand for units that meet the needs of persons with disabilities, and units for larger families. With no new social housing units being created, finding ways to address these challenges is becoming more difficult.

These challenges are made worse by an aging social housing stock in need of substantial capital repairs. In the spring of 2014, the City reviewed social housing providers' capital repair reserve fund studies. It was identified that only ten of the 43 social housing providers had current building condition assessments and reserve fund studies. The studies for the ten housing providers with completed building condition assessments project a deficit of over \$400 million in 20 years. These ten housing providers represent approximately 60% of Hamilton's social housing units.

This situation, coupled with aging and substandard rental stock in the private market, threatens to reduce the stock of affordable rental units even further.

Social housing programs need to be responsive to community needs well into the future. This means that they are must not only be sustainable but be proportional to changing population growth and demographics. Just to maintain the existing stock of social housing, additional funding is needed to undertake necessary capital repairs, and maintain the stock as social housing in light of the end of operating agreements. Additional units are required to keep pace with population growth and meet unmet demand.

Inclusion

The federal government should place priority on social inclusion as an objective in new construction or revitalization of social housing. Individuals are affected by the neighbourhoods and environments they live in. People in disadvantaged neighbourhoods face lower outcomes in health, employment, income and education. Good housing improves economic and health outcomes.

A national housing strategy should recognize the success of mixed-income communities where social inclusion is supported by design and programming that encourages social interaction and the development of community. Offering federal government assistance to housing providers to incorporate things like 'visitable' elements, carefully placed entrances, and programming increases interaction among different groups.

Attention to details that promote safety and security in public spaces make people feel more at ease and welcome in public places. Working to sustain clean, well-maintained public spaces and buildings supports the perception of safety and

security and increases people's commitment and attachment to their home and neighbourhood.

Flexibility

Use of data and best evidence to achieve desired outcomes

Housing initiatives and approaches should be built on the **best evidence** available and the achievement of **desired outcomes**. We need to close **data gaps** to better inform our decisions and policies. Actions need to be **measured and tied to results** to ensure success.

Response:

There are significant gaps in data that make decision-making on the basis of evidence and measuring outcomes difficult. These include the following.

Household Data/Specific Housing Needs

Only the most basic data on households and housing need is currently available, and it is only available infrequently when the National Household Survey is done. More frequent and detailed data about people's housing needs would be helpful in the development of both policies and programs. This includes:

- *The housing needs of persons with disabilities. There is a wide range of housing need dependent on ability. There are anecdotal reports that persons with disabilities are underserved by affordable rental housing, but outside of some basic variables in the social housing wait list data, the types of accessible housing needed by persons with disabilities is unknown.*

Neither the number/proportion of accessible units needed in new development, nor the number/proportions of units with particular types of accessibility features are known. For instance, how many people's needs would be served by simple inexpensive accessibility features such as levered door handles, accessible height switches and receptacles, wider doorways, accessible appliance controls, and similar, versus by units that are fully accessible for wheelchair and scooter use?

- *The housing needs of newcomers, as the housing needs are different for different cohorts of newcomers. How many large families and singles are there in each new cohort? How many need an accessible unit, and what type of accessible unit do they need? What are their locational needs? What are their needs for housing supports. Where are their needs not being met?*

- *The housing needs of those who are not on the social housing wait list, but are struggling to meet their housing needs (the working poor, young families, seniors, singles, etc.)*

Data Needed More Frequently

- *Annual income data related to housing variables such as housing affordability, would help immensely. Every five years is insufficient.*
- *More frequent housing market data. Rental market data is needed every 6 months rather than annually because the market is changing so quickly.*

New Data Sets Needed

- *The secondary rental market, including apartments in houses and illegal units*
- *Residential mobility, including migration both within and between municipalities (origin, destination, reason for move)*
- *How those who cannot afford their housing make ends meet (which other necessities do they forego to pay the rent?)*
- *Various outcome measures related to housing variables:*
 - *Housing stability/retention*
 - *Poverty rates*
 - *Health outcomes and health care service use, including mental health*
 - *Emergency system use*
 - *Educational attainment*
 - *Employment status*
 - *Contact with the correctional system*
- *Real time data on individuals and households experiencing homelessness: basic demographic and personal data, factors that outline vulnerabilities*
- *Community level data on homelessness: inflow and outflow, the number of people experiencing homelessness at any given time, and outcomes as above*

Additionally, data is needed on a municipal or local housing market zone basis rather than just the Census Metropolitan Area (CMA) as planning happens at the municipal, not CMA level. Currently the City of Hamilton must purchase a special run of rental housing market data based on the local housing market zones, and municipal rather than CMA boundaries.

Both municipalities and academics should have access to detailed data to support greater collaboration and information sharing.

A continuum of housing options to address different housing needs and markets across Canada

Housing markets vary widely across Canada. The housing needs of Canadians living in Vancouver, Thunder Bay or Iqaluit also vary to a significant degree. How can we ensure that Canadians have **access to housing options** within their communities that meet their needs and they can afford?

Response:

Hamilton agrees with this statement. By implementing a national housing strategy that includes adequate funding and other policy responses, such as those included in Hamilton's submission, Canadians will have access to housing that provides the foundation for healthy and prosperous lives.

Are these the housing topics you want to talk about? What important housing topics have we missed? Share your thoughts about any of these themes, and make a real and positive change in the lives of Canadians.

Response:

Affordability and Income

Affordability of housing is determined by two factors: housing price and income. In Hamilton, the shelter components of social assistance rates do not cover the costs of delivering even the most modest housing. Even non-profit housing providers who wish to provide housing to social assistance recipients cannot do so at rents tenants can afford without some level of government funding.

Social assistance shelter rates are far less than purpose built market rents. Social assistances rates in Ontario that have decreased relative to inflation for the last many years. The current shelter component of the allowance for a single person on Ontario Works falls far short of what is required to rent a bachelor apartment, or even a room in a shared apartment. Those social assistance recipients who are not lucky enough to be housed with a social or non-profit housing provider struggle in the private market.

The situation is improved for families due to the Child Tax Benefit; however, it is necessary for families to spend a significant portion of the Child Tax Benefit on rent. Singles struggle significantly. The working poor also struggle to pay private market rents.

Many of those who cannot afford purpose-built rents and are not served by social or non-profit housing, end up in the lower end of the secondary rental market. The City knows little about this market as many of the units are illegal. City

enforcement efforts have revealed some horrific and unsafe conditions. People have died in units that did not meet Fire Code standards.

The lack of data on the secondary rental market is a significant challenge. Neither the number of illegal units, nor their conditions or code compliance are known. There is currently a movement towards licensing of landlords with small rental buildings, but there is a fear that many of those in the most affordable of these units will be made homeless as a result. It is unacceptable that an illicit market in which many units are unsafe is the only place that some citizens, both some working poor and those on social assistance, are able to find homes they can afford.

Income initiatives such as a guaranteed annual income, or a broad federal housing benefit based on income are needed and would provide greater benefits and housing security over the long term. Other initiatives that can directly impact income, such as a national day care program, would also help. The federal government is in the best position to initiate income distribution programs.

In Ontario the majority of the burden of the housing system falls on the municipal property tax levy. Through 2015 the City of Hamilton paid more than 50% of all housing program costs from the property tax levy. Housing affordability is an income related policy and, as such, was never anticipated as an expenditure at the municipal or local level. Municipalities have very limited taxation powers. Many municipalities serve areas far beyond their boundaries. Because of its relative affordability, Hamilton serves, not only those from nearby smaller towns and rural areas, but also those from nearby urban areas who can no longer afford the high housing prices there. This is further eroding Hamilton's relative affordability.

Further, property tax is not based on the ability to pay. This is especially true in the case of rental housing where the multi-residential tax rate for older rental buildings can be higher than that for ownership housing. Hamilton has equalized the tax rate for new rental housing, but to equalize it for older buildings would significantly reduce an already constrained budget. With rapidly increasing property values, many citizens, particularly those on fixed incomes, are finding it increasingly difficult to pay their property taxes. Taxation to pay for housing services for those in need should be a progressive tax, based on income rather than property values.

***This last section is for information only.**

Better outcomes. Real change.

The success of the National Housing Strategy depends on whether it will create better outcomes and real results for families, communities, and the economy. An initial set of high-level outcomes confirms what we are setting out to achieve.

As a next step, we will develop specific targets for these outcomes. This will help ensure we are on the right track.

We will work with Indigenous peoples to tailor outcomes that meet their unique needs.

This includes changes for the better for a wide range of social, fiscal and environmental issues, such as:

Sustainability

Housing is environmentally, socially and financially sustainable.

Environmental sustainability: Housing and communities are healthy, resilient, and contribute to Canada's climate change goals

Sustainable housing has a reduced impact on our environment. It is energy efficient, resilient and healthy to live in. It adapts easily to life's changing needs. It is a cornerstone of vibrant communities, where we live, work, grow and play. And it supports Canada's climate change goals.

Examples of possible outcomes

Short-Term:

- Reduced energy consumption in housing.

Medium-Term:

- Greater integration of sustainable technologies and practices.

Long-Term:

- Greenhouse Gas (GHG) emissions from housing sector are reduced.

Social sustainability — housing is a foundation for improved life prospects and equal access to opportunities

Housing can serve as a foundation for a better quality of life. It can promote good health and well-being. It provides a stable platform to access opportunities, like finding a job, getting an education and becoming more financially secure.

Examples of possible outcomes

Short-Term:

- Housing facilitates access to education, jobs and services.

Medium-Term:

- Households move along the housing continuum.

Long-Term:

- Housing increases opportunities and prospects of Canadians.

Financial sustainability — Canada has a strong housing system that supports economic stability and growth.

A strong housing system and a stable economy go hand-in-hand. Many players work together to help Canadians meet their housing needs. This includes governments, financial institutions, investors, developers and housing providers, to name a few.

Making best use of government funding will ensure the sustainability of the housing sector, while creating jobs and strengthening the economy.

Examples of possible outcomes

Short-Term:

- Efficient construction, operations, financing and maintenance lower costs and improve performance.
- New construction and renovation/retrofit activity spurs jobs in the construction sector.
- Housing-related debt for Canadians is moderated.

Medium-Term:

- Efficiency in federal investments is enhanced.

- Housing activity is an economic multiplier on the broader economy and supply chain.
- Continuity in housing investment supports economic stability.

Long-Term:

- Canada benefits from a strong, innovative and self-reliant housing sector.
- Housing contributes to employment, a stable financial system and a strong economy.
- Canada's economy can rely on the strength and resiliency of the housing system.

Affordability

Canadians have housing that they can afford, and that meets their needs.

When Canadians can afford housing that meets their needs, they have money in their pockets for other life necessities. However, access to affordable housing can be a challenge for low-income Canadians. There is not enough housing in remote communities. In our biggest cities, the middle class is also experiencing affordability pressures. In these cities, buying a home is out of reach for many.

Examples of possible outcomes

Short-Term:

- More affordable housing.
- Enhanced affordability for homebuyers in high priced housing markets.

Medium-Term:

- Proportion of households in housing need reduced by x%.

Long-Term:

- All Canadians have access to adequate housing that they can afford.

Inclusivity

Housing contributes to social inclusion and wellness for all Canadians

Housing can contribute to social inclusion and wellness for all Canadians, such as the homeless, seniors, veterans, victims of family violence, newcomers to Canada and persons with disabilities. Our plan will consider how housing can respect different cultural and social needs.

Examples of possible outcomes**Short-Term:**

- More units for low and modest income people in mixed income housing developments.
- More home adaptations for independence.
- More Canadians who are homeless or at risk of homelessness have access to housing and related supports.
- Women's access to shelters and transition homes is improved.

Medium-Term:

- Social inclusion in neighbourhoods is improved.
- Housing is accessible, visitable, adaptable to life changes and reflects the principles of universal design.
- Systems are in place to prevent homelessness and support the economic and social inclusion of individuals who have experienced, or are at risk of, homelessness.
- Rates of women turned away from shelters are reduced by x%.

Long-Term:

- Poverty in Canada is reduced by x%.
- Seniors and persons with disabilities may live independently in their homes within their communities.
- Homelessness in Canada is rare, brief and non-recurring.
- Women and children successfully transition to safe and independent living in their communities following incidences of domestic violence.

Flexibility

Canadians have access to housing options that meet their diverse and changing needs.

There are significant differences in housing needs across the country. A variety of responses is required to address diverse housing needs.

Examples of possible outcomes**Short-Term:**

- Policy responses are flexible to meet the diverse and changing needs of Canadians across the country.

Medium-Term:

- Communities have housing options that meet the diverse and changing needs of Canadians.

Long-Term:

- Canada has well-functioning, dynamic housing markets.

By working together, we can set the stage for better outcomes in all of these areas over the short, medium and longer terms. Establishing indicators and targets to track our progress is an important next step. Let us know which of these outcomes is most important to you.